

Privacy policy

This Privacy Policy describes the types of information that Scrooge Frog OÜ (“ScroogeFrog AdNetwork”) collects from and about you when you visit or use one of our websites, including <http://adn.scroogefrog.com/>. This Privacy Policy also explains how ScroogeFrog AdNetwork may use and disclose such information, as well as your ability to control certain uses of it.

By using the Site, you agree to the collection, use, and disclosure of your information as described in this Privacy Policy, and agree to the ScroogeFrog AdNetwork [Terms of Use](#), which are incorporated by reference. If you do not agree, please do not access or use the Site.

1. INFORMATION WE COLLECT

- **Information You Provide**

We collect information from you when you choose to share it with us. This may include when you use our Site or services, register or create an online account through the Site to participate as a Advertiser or Publisher in the ScroogeFrog network (“Network”), request information from us, sign up for newsletters or our email list, request customer support, or otherwise communicate with or contact us. The information we collect may include your name, company name, address, email address, date of birth, telephone or mobile number, website URL, and Skype or other instant messaging user name.

If you are a registered Advertiser or Publisher in the Network, we may also collect additional information from you. This may include, but may not be limited to, date of birth, additional information about your company (for example, a tax ID number), banking or financial information, a credit/debit card number and related information (such as CVV, expiration date, and billing address), social security number, and Driver’s License number.

- **Information Automatically Collected**

We may use a variety of technologies such as cookies, web beacons, pixel tags, log files, HTML5 cookies, or other technologies to collect certain information about visitors to, and users of, our Site and interactions with our emails and online advertisements, and to allow ScroogeFrog AdNetwork to keep track of analytics and certain statistical information

For example, we may automatically collect certain information from you, including but not limited to your browser type, device type, operating system, unique device identifier of any of your computer(s) or device(s) that are used to access the Site, software version, Internet

Protocol (“IP”) address, geolocation, phone model, phone operating system, and the domain name from which you accessed the Services. We also may collect information about your use of the Site, including the date and time you visit the Site, the areas or pages of the Site that you visit, the amount of time you spend viewing or using the Site, the number of times you return to the Site, other click-stream or site usage data, emails that you open, forward or click-through to our Site, and other sites that you may visit.

Third Party Service Providers. We may use third party service providers to support our Site. Some of these service providers may use technology such as cookies, web beacons, pixel tags, log files, or HTML5 cookies to receive, collect, and store information.

Third Party Analytic Technologies. We may use third parties’ analytics and tracking tools to better understand who is using the Site, how people are using the Site, how to improve the effectiveness of the Site and related content, and to help us or those third parties serve more targeted advertising to you across the Internet. These tools may use technology such as cookies, web beacons, pixel tags, log files, HTML5 cookies, or other technologies to automatically collect and store certain information. They may also combine information they collect from your interaction with the Site with information they collect from other sources. We do not have access to, or control over, these third parties’ use of cookies or other tracking technologies.

• Information Collected From Other Sources

We may acquire information from other trusted sources to update or supplement the information that you provide or that we collect automatically (such as information to validate or update your address or other demographic information). We may use this information to help us maintain the accuracy of the information we collect, to target our communications so that we can inform you of products, services or other offers that may be of interest to you, and for internal business analysis or other business purposes.

• Combination of Information

We may combine the information we receive from and about you, including information you provide to us and information we automatically collect through our Site, as well as information collected offline, across other computers or devices that you may use, and from third party sources.

2. INFORMATION USE

ScroogeFrog AdNetwork may use the information we collect from and about you for any of the following purposes:

- To respond to your inquiries, and contact and communicate with you when necessary;
- To enhance your online experience, including as a way to recognize you and welcome you to the Site;
- To review the usage and operations of our Site, develop new products or services, and conduct analysis to enhance or improve our content, products, and services;
- To provide you with customized Site content, targeted offers, and advertising on the Site, via email or text message, or across other websites, social media or online services;
- To contact you with information, newsletters and promotional materials from ScroogeFrog AdNetwork or on behalf of our partners and affiliates;
- To use your data in an aggregated non-specific format for analytical and demographic purposes;
- To protect the security or integrity of the Site and our business, such as by protecting against and preventing fraud, unauthorized transactions, claims and other liabilities, and managing risk exposure, including by identifying potential hackers and other unauthorized users;
- To use and disclose your financial information (including banking information, credit or debit cards) only to process payments and prevent fraud; and
- For other purposes disclosed at the time you provide your information or otherwise with your consent.

3. INFORMATION WE SHARE

Except as provided in this Privacy Policy, ScroogeFrog AdNetwork will not sell, distribute, or rent any of your information to any third parties without your consent. We may share the information we collect from and about you in the following ways:

- **Network Participants:** If you are a registered Advertiser in the Network, limited information may be shared with Publishers that participate in the Network in order to provide the services; similarly, if you are a registered Publisher in the Network, limited information may be shared with Advertisers that participate in the Network in order to provide the services. The information that may be shared is generally limited to company name, website URL, city and state.
- **Service Providers:** We may share your information with third party service providers that provide business, professional or technical support functions for us, help us operate our business and the Site, or administer activities on our behalf.
- **Select Third Parties:** We may share your information with our select partners, affiliates, and other third parties that we believe may have offers of interest to you.
- **Legal Matters; Safety:** We may access and disclose your information to respond to subpoenas, judicial processes, or government requests and investigations, or in connection with an investigation on matters related to public safety, as permitted by

law, or otherwise as required by law. We may disclose your information to protect the security of our Site, servers, network systems, and databases. We also may disclose your information as necessary, if we believe that there has been a violation of this Privacy Policy, our [Terms of Use](#), any other legal document or contract related to our services, or the rights of any third party.

- ***Sale or Transfer of Business or Assets:*** We may sell or purchase assets during the normal course of our business. If another entity acquires us or any of our assets, information we have collected about you may be transferred to such entity. In addition, if any bankruptcy or reorganization proceeding is brought by or against us, such information may be considered an asset of ours and may be sold or transferred to third parties. Should such a sale or transfer occur, we will use reasonable efforts to try to require that the transferee use personal information provided through this Site in a manner that is consistent with this Privacy Policy.
- ***Aggregate or Anonymous Non-Personal Information:*** We may also share aggregate, anonymous, or de-identified non-personal information with third parties for their marketing or analytics uses.
- ***Other:*** We also may share your information as disclosed to you at the time of collection.

4. YOUR CHOICES AND OPT-OUTS

Cookies, Tracking Options and the EU Do Not Track Disclosures

Certain parts of our Site require cookies. You are free to set your browser or operating system settings to limit certain tracking or to decline cookies, but by doing so, you may not be able to use certain features on the Site or take full advantage of all of our offerings. Please refer to your Web browser's or operating system's website or "Help" section for more information on how to delete and/or disable your browser or operating system from receiving cookies or controlling your tracking preferences.

Our system may not respond to Do Not Track requests or headers from some or all browsers. We may use cookies or other technologies to deliver more relevant advertising and to link data collected across other computers or devices that you may use. To understand your choices for receiving more relevant advertising or to manage your settings, please review the information below:

- To learn more about the use of cookies or other technologies to deliver more relevant advertising and to know your choices with respect to collection and use of the data by these third party tools, you may visit the Network Advertising Initiative's (NAI) opt-out page at <http://www.networkadvertising.org/choices>, or Digital Advertising Alliance's (DAA) opt-out page at <http://www.aboutads.info/choices>. To opt-out of the use of your mobile device ID for targeted advertising, please see <http://www.aboutads.info/appchoices>.

- If you wish to prevent your data from being used by Google Analytics, Google has developed the Google Analytics opt-out browser add-on available [here](#).
- On your mobile device, you may also adjust your privacy and advertising settings to control whether you want to receive more relevant advertising.

Opt Out Preferences

We provide our customers with the opportunity to opt-out of having their information used for purposes not directly related to your participation in the Network as an Advertiser or Publisher. To opt-out of marketing communications, you may use one of these convenient methods:

- ***Electronic Promotional Offers.*** If you do not want to receive emails from us regarding special promotions or offers, you may (i) click the unsubscribe link in the footer of any email; (ii) email us at adnetwork@scroogefrog.com with “Unsubscribe from Email Offers” in the subject line; or (iii) contact your ScroogeFrog AdNetwork Account Manager.
- ***Telemarketing.*** If you do not want to receive marketing phone calls from us, you may: (i) email us at adnetwork@scroogefrog.com with “Do Not Call” in the subject line; (ii) call customer care at +(372) 698-04-75 or mail us at the address set forth below; or (iii) ask to be placed on our Do Not Call list when you receive a call from us.

Your instructions to limit the use of your information for these purposes will be processed as soon as reasonably practicable. Additionally, we are not responsible for informing third parties (including without limitation our third party service providers or partners) with whom we have already shared your personal information of any changes requested pursuant to this section, or for removing information from or causing information to be removed from the databases or records of such entities.

Access to Your Information

If you wish to verify, correct, or update any of your personal information, you may (a) contact your Account Manager; or (b) login to your Account page on the Site to sign into your account. If you choose to deactivate your account, we may still retain certain information for analytical purposes and recordkeeping integrity, as well as to prevent fraud, resolve disputes, enforce our [Terms of Use](#) or other policies, take actions we deem necessary due to technical and legal requirements, and as dictated by constraints related to the security, integrity and operation of our Site.

5. YOUR PRIVACY RIGHTS

ScroogeFrog AdNetwork does not share consumer personal information with third parties or affiliated companies for their direct marketing purposes. If you have any questions, please contact us at adnetwork@scroogefrog.com, and put the statement “Your Privacy Rights” in the subject field.

6. THIRD-PARTY CONTENT, LINKS, AND PLUG-INS

The Site may have links to third-party websites, which may have privacy policies that differ from our own. We are not responsible for the practices of such sites.

The Site may also offer you the ability to interact with social plugins from social media sites, which may allow us and/or the social media site to receive data from or about you. In some cases, we may know that you clicked on a social plugin, such as a Twitter Follow button, or received other information from the social media sites. Similarly, if you have previously provided personal information to a third-party operating a plug-in on this Site, then such third-party may recognize you on this Site. Your use of social network plugins is subject to each social media site's privacy policy, which may be different from ours, so please read these policies carefully to understand their policies and your options. As with linked sites, we have no control over the information that is collected, stored, or used by social network plugins, and are not responsible for the practices of such sites.

7. PUBLIC FORUMS

Any information you may disclose on our Site, in blogs, on message boards, in chat rooms, or on other public areas on the Site or other third-party websites that this Site may link to, becomes public information. Please exercise caution when disclosing personal information in these public areas.

8. CHILDREN'S PRIVACY

Protecting children's privacy is important to us. We do not direct the Site to, nor do we knowingly collect any personal information from, children under the age of thirteen. If ScroogeFrog AdNetwork learns that a child under the age of thirteen has provided personally identifiable information to the Site, it will use reasonable efforts to remove such information from its files.

9. DATA SECURITY

We have taken certain physical, administrative, and technical steps to safeguard the information we collect from and about our customers and Site visitors. While we make every effort to help ensure the integrity and security of our network and systems, we cannot

guarantee our security measures. When you enter sensitive information (such as credit card information) on our forms, we encrypt the transmission of that information.

10. REVISIONS TO THIS PRIVACY POLICY

We reserve the right, at our sole discretion, to change, modify, add, remove, or otherwise revise portions of this Privacy Policy at any time. When we do, we will post the change(s) on the Site. Your continued use of the Site following the posting of changes to these terms means you accept these changes. If we change the Privacy Policy in a material way, we will provide appropriate notice to you.

11. HOW TO CONTACT US

If you have any questions or concerns about this Privacy Policy or the practices described herein, you may contact us at adnetwork@scroogefrog.com or by mail to:

Scrooge Frog OÜ
Ilmatsalu tn 36-24
Tartu 50408, Estonia